

1
2
3
4
5
6 **UNITED STATES DISTRICT COURT**
7 **CENTRAL DISTRICT OF CALIFORNIA**
8 **WESTERN DIVISION**

9
10 CENTER FOR BIOLOGICAL
11 DIVERSITY, et al.,

12 *Plaintiffs,*

13 v.

14 DOUG BURGUM, et al.,

15 *Defendants,*

16 SABLE OFFSHORE CORP.,

17 *Intervenor-Defendant.*

18
19 Case No. 2:24-cv-05459-MWC-MAA

20
21
22 **DECLARATION OF**
23 **BRADY BRADSHAW**

24
25 I, Brady Bradshaw, declare as follows:

26 1. I have personal knowledge of the statements in this declaration, and I
27 could and would competently testify to these matters if called as a witness under
28 oath.

29 2. I am currently employed by the Center for Biological Diversity
30 (Center) as a Senior Oceans Campaigner and have been a member of the Center
31 since February 2022.

1 3. I live in Santa Cruz, California, and frequently visit Santa Barbara for
2 work and personal recreation. For example, I visited the area twice this year,
3 swimming and going on beach walks at Rincon Point in March and West Beach in
4 April. I plan to visit a couple of times this summer or fall, during which I intend to
5 visit Refugio State Beach and swim and dive in the Santa Barbara Channel.

6 4. I enjoy the unique beauty of Santa Barbara's beaches, including
7 places like Refugio State Beach and Rincon Point. Some of my favorite activities
8 include swimming, snorkeling, and diving in the Santa Barbara Channel. I also
9 enjoy skateboarding and biking along the coast. These activities are an important
10 part of my life and something I will do as long as I can.

11 5. I am a recreational and competitive freediver. I am on the U.S.
12 National Team for freediving and have broken 13 national records. Freediving
13 involves diving deep into the ocean without respiratory equipment and exploring
14 the underwater world. My dives range from 10 to 180 feet, and I love being able to
15 study the underwater world up close. Freediving is also central to my spirituality.

16 6. I started freediving in 2015 and have done many trips off the Santa
17 Barbara coast since 2018. I visit the area to dive at least once a year, but for the last
18 two years I've gone diving and swimming there every few months. I love the
19 natural diversity and environment in the area and intend to continue going as often
20 and as long into the future as I can.

21 7. One of my favorite places to dive is the Channel Islands. I did a
22 particularly special dive there in 2022. As I dove into a dense kelp forest, I was
23 surrounded by marine life, including harbor seals that were swimming nearby. On
24 the boat ride back to shore, I saw a super-pod of dolphins, with hundreds of
25 animals swimming freely. It gave me a lot of hope to see such an abundant,
26 diverse, and thriving ecosystem.

27 8. I always look for native species on dives and beach walks near Santa
28 Barbara, where I have seen crabs, sting rays, a shark, kelp, sea lions, dolphins,

1 giant starfish, cormorants, seagulls, and pelicans. I appreciate seeing these animals
2 in the wild, and it gives me a lot of joy and benefits being able to do so.

3 9. The ocean is an important part of my spiritual practice. I found
4 spirituality in the water in 2015 around the same time that I started freediving. I
5 pray at the water's edge and conduct rituals of exchange with the ocean that
6 symbolize the weaving of my body into the sea. These rituals have marked
7 important transition points in my life, helping me let go of the past while giving
8 myself over to the ocean and fate. I have prayed and engaged in these rituals on
9 Santa Barbara's beaches, including at Rincon Point and Gaviota State Park.

10 10. I have closely followed and opposed efforts to resume offshore oil and
11 gas drilling in the Santa Barbara Channel, including the Bureau of Safety and
12 Environmental Enforcement's (BSEE) decision to extend the leases in the Santa
13 Ynez Unit and issue permits needed for a restart. I am aware of the immense
14 habitat destruction and animal deaths that resulted from the tens of thousands of
15 gallons of oil that spilled onto Refugio Beach in 2015. I am deeply concerned that
16 if production resumes in the Santa Ynez Unit, another oil spill will occur and cause
17 great harm to my personal and professional interests.

18 11. I find the biodiversity of the Santa Barbara Channel captivating, and
19 being able to swim and dive there is important to me recreationally, competitively,
20 and spiritually. Oil production in the Santa Ynez Unit causes noise pollution, water
21 pollution, vessel strikes, and other impacts that harm the animals I love to see and
22 the coastal areas I love to explore.

23 12. The impacts from production and the risk of a spill are elevated every
24 day that leases in the Santa Ynez Unit remain active. If production resumes, I
25 believe it is only a matter of *when*—and not *if*—an oil spill happens. I know the
26 pipelines for the Santa Ynez Unit have already ruptured once, and know the
27 pipelines, platforms and other associated infrastructure are past their intended
28 lifespans and are at higher risk of leaks and spills with each passing day. I would

1 not enjoy diving in the Santa Barbara Channel as much if production restarts,
2 because there will be an increased risk of an oil spill while I am in the water. If a
3 spill were to occur, I would not get back into the water for a very long time due to
4 the health impacts the spill would cause. An oil spill would also inhibit my
5 spiritual practices, preventing me from going to the affected shorelines to pray and
6 conduct rituals of exchange with the ocean.

7 13. The quality of air I breathe is particularly important to my experience
8 of freediving. Maintaining healthy lungs is the most important part of my training
9 as a diver. I have asthma, and breathing in the harmful air pollution associated with
10 oil processing facilities would harm my health.

11 14. But most troubling to me would be the irreparable harm that an oil
12 spill would cause to the marine life that makes each dive so transformative, from
13 kelp to fish to harbor seals.

14 15. Water quality is also very important to my health and safety, because I
15 spend long periods of time in the water and may ingest the water. I could be
16 exposed to pollutants that reach the water from a spill or oil production operations.
17 I have seen oil sheens on the water in the past. When I see one, I will not get into
18 the water and end up missing out on the activities that are so physically and
19 spiritually important to me. I have also seen oil sheens while diving, which harms
20 my enjoyment of freediving because I know I may be breathing in fumes from
21 pollutants while at the surface or absorbing them through my skin while
22 underwater, and that I may be harming my health. When this happens, I will end
23 my dive. It also is upsetting to know that the sensitive plants and animals that live
24 in the water could be sickened or killed by the oil.

25 16. My work is dedicated to ending offshore oil drilling because of the
26 damage that fossil fuels cause our planet. I am deeply worried about the irreparable
27 harm that could result from restarting oil production in the Santa Ynez Unit using
28 decades-old, corroded pipelines and platforms. That's why I have taken so many

actions to oppose it, including testifying at numerous local and statewide public hearings; organizing alongside community members who share my fears; contacting my elected representatives; and writing agency officials.

17. My freediving, swimming, and ocean-based spiritual practices are a core part of who I am and are central to my wellbeing. These interests would be irreparably harmed if oil production resumes in the Santa Ynez Unit without full adherence to laws intended to protect our oceans and environment.

I declare under penalty of perjury that the foregoing is true and correct to the best of my personal knowledge, information, and belief.

Executed on April 30, 2025

B. Brads

Brady Bradshaw